To: Lorang, Phil[Lorang.Phil@epa.gov]

From: Beaver, Melinda

Sent: Thur 6/8/2017 1:28:29 PM **Subject:** FW: regional haze question

Think this is a fair and accurate response?

Hi Brian,

I'm not going to have time to dig into FL, DE, CT, DC, MA BART actions by Monday (out tomorrow and have many other priorities today). My sense is that for these states that were in CAIR but are not in CSAPR, no additional controls were required for BART and that existing limits satisfied BART. Florida could be the exception, but both facilities (Crystal River and Lansing Smith) where I found limits are listed as "not active" in your spreadsheet.

Melinda

From: Fisher, Brian

Sent: Wednesday, June 07, 2017 3:11 PM

To: Beaver, Melinda < Beaver. Melinda @epa.gov>

Subject: RE: regional haze question

Got it, thanks

From: Beaver, Melinda

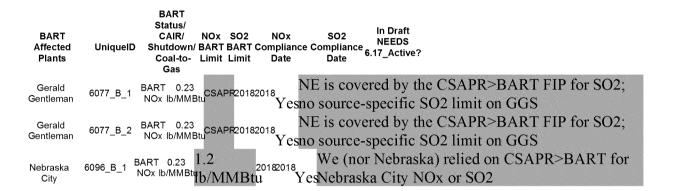
Sent: Wednesday, June 07, 2017 3:08 PM **To:** Fisher, Brian < Fisher. Brian@epa.gov >

Subject: RE: regional haze question

Hi Brian,

A bit more on Nebraska City and GGS... We only used CSAPR>BART for SO2 at GGS. We approved NE's NOx limits for GGS, and we approved both NOx and SO2 limits for Nebraska City. It's a pretty unique situation.

So, I think these rows should be:



I haven't looked at the Northeast states + Florida yet.

Melinda

From: Fisher, Brian

Sent: Tuesday, June 06, 2017 1:23 PM

To: Beaver, Melinda <Beaver. Melinda @epa.gov>

Subject: RE: regional haze question

Hi Melinda,

Thanks for the response - it is very helpful.

If possible, that would be great if you could check to see if there are any BART limits in the below states we are missing. We have a couple more days (to next Monday actually), so getting the latest/greatest data reflected will be great and improve our power sector and subsequent air

modeling. It will also allow us to respond that we are fully capturing the CSAPR replacing CAIR impacts.
Thanks again for your help
From: Beaver, Melinda Sent: Tuesday, June 06, 2017 1:18 PM To: Fisher, Brian < Fisher. Brian@epa.gov > Subject: RE: regional haze question
Hi Brian,
Some notes (in red) below.
From: Fisher, Brian Sent: Monday, June 05, 2017 3:45 PM To: Beaver, Melinda < Beaver. Melinda@epa.gov > Subject: regional haze question
Hi Melinda,
I was wondering whether there were any cases where units (other than TX potentially) that were previously modeled as not having source specific BART because of CAIR, now would have source-specific BART because they were not covered under CSAPR?
For example
•□□□□□□□ States covered by CAIR for SO ₂ that are not covered by CSAPR for SO ₂ : DC, DE,

FL, LA, MS; also TX if/when we finalize the proposed SO₂ remand rule.

- We have a December 2017 CD deadline to take final action on BART in LA. For now, no source specific SO2 BART limits in LA, yet. We've proposed action for a subset of the LA EGUs: https://www.federalregister.gov/documents/2017/05/19/2017-10108/approval-and-promulgation-of-implementation-plans-louisiana-regional-haze-state-implementation-plan. We have a June 29 deadline to propose action on the remaining EGU: Entergy's Nelson.
- MS is still working on their SO2 BART SIP. No deadline for EPA action; therefore, no source specific SO2 BART limits in MS, yet.
- I thought FL has a state-wide BART alternative rule, but I'm not sure, so I'll need to look.
- We haven't taken actions on DC and DE recently, so I'm not exactly sure what BART limits may be in place there. (I focused on updates that resulted from actions taken since 2015).
- \square \square \square States covered by CAIR for either annual or OS NO_X that are not covered by either CSAPR or the CSAPR Update for either annual or OS NO_X: CT, DC, DE, FL, MA.
- I thought FL has a state-wide BART alternative rule, but I'm not sure, so I'll need to look.
- We haven't taken actions on DC, DE, CT, MA recently, so I'm not exactly sure what BART limits may be in place there. (I focused on updates that resulted from actions taken since 2015).

If you need me to double check limits for the above states, I'll need a few more days.

Are there any units in these states that find themselves with newly acquired BART requirements?

Brian Fisher

Clean Air Markets Division

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